

Procedures for M.D.A. Standardized Trainers

Michigan Department of Agriculture
Food and Dairy Division

September 3, 2008

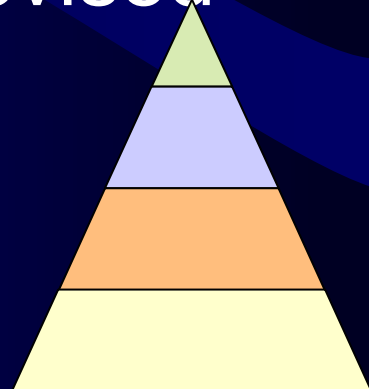
Training Session Agenda

- Historical Perspective
- Required Reading
- Forms and Highlights of Recent Changes
- Marking Evaluation Report Exercise
- Q and A
- Wrap up

A Historical Perspective of Standardization

Standardization Pyramid

- National “Standard” ► All FDA Regional Food Specialists (RFS)
- FDA RFS ► 2 persons/state
- Trickle down effect to local inspectors
- Renewal every 3 years
- Written procedures- continuously revised



Definitions

- Candidate
- Standard



Standardization

The process whereby the candidate

demonstrates

knowledge and skills

under the

“Procedures for Field Standardization of Trainers”.

Certificate

- In the retail food program, the certificate is the means by which a person is recognized as being standardized
- The Standardization Procedures describe what the “Standard” and the “candidate” must do to successfully complete the exercise
- Certificate is awarded for **success**

Recommendations

- At least one person per local or district health department
- Experienced and trained

Required Reading

2005 FDA Food Code



Annex 4 and Annex 5

Annex 4

- Proactive versus Reactive
- Assessing Active Managerial Control
- HACCP

Annex 4

- Allergens
 - What should I be asking??

Allergy Poster forthcoming

Annex 4- Conducting Hazard Analysis

- Determine Process Flow
- Incorporate HACCP into the flow
 - eg. Cooling



Annex 5

- Primer for evaluation
- Provides Primer
- Get Back on Track
- RBI required by Food Law

Annex 5

- Know the Processes all the way Through
- Focuses evaluation
 - Spend Much of the Time Evaluating
 - Ask Questions

Annex 5

- Ask Open Ended Questions
- Conduct Walk Through Inspection
- Vary Inspection Time

Annex 5

- Assess AMC of Risk Factors
 - Source
 - Holding Temperature
 - Cook Temperature
 - Contaminated Equipment
 - Hygienic Practices



Annex 5

- Risk Based Inspections (RBIs)
- Good Retail Practices (GRPs) -
Good Manufacturing Practices (GMPs)
- Standard Operating Procedures (SOPs)
- They all tie in together



Annex 4 and 5

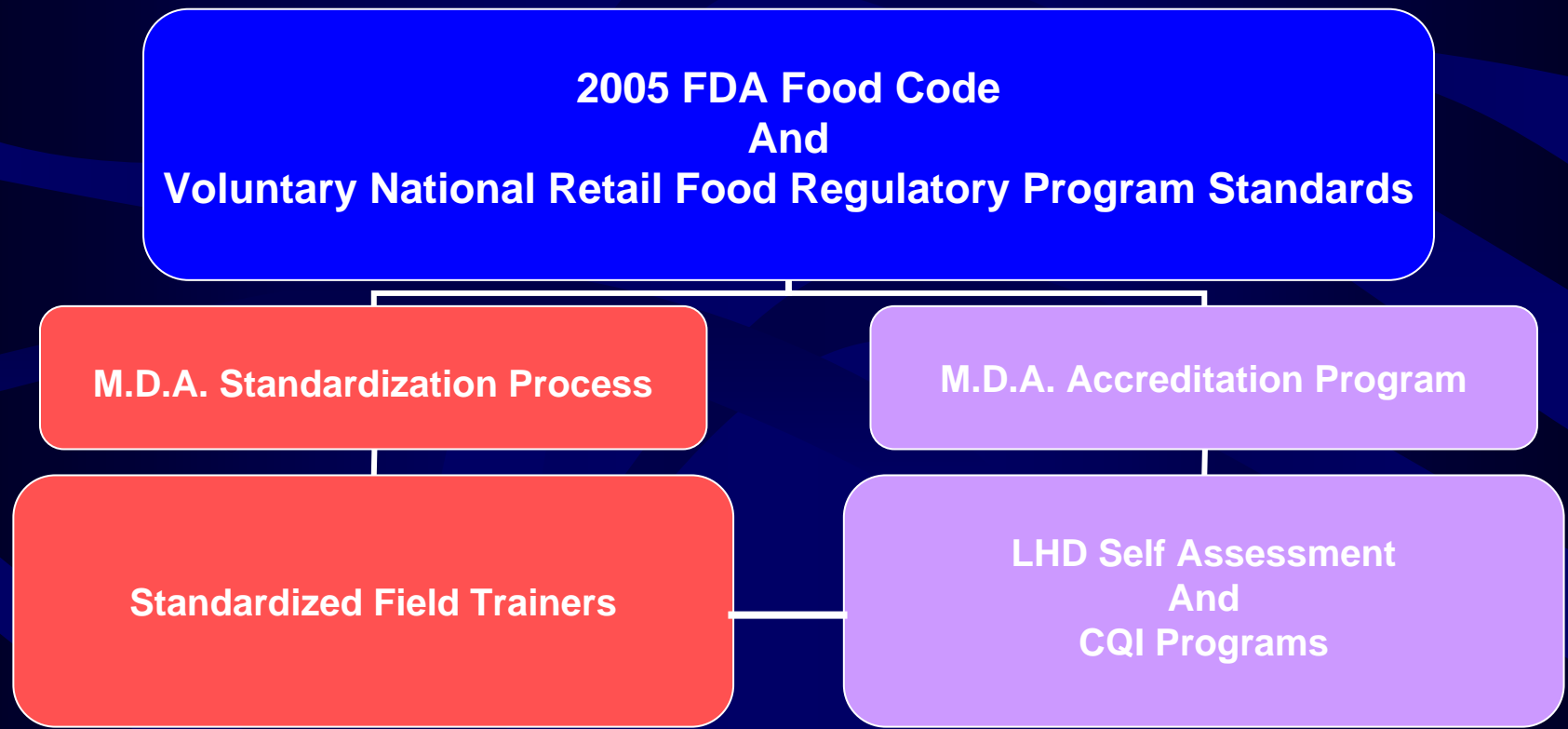
- Consider Them Tools
- Required Reading
 - How FDA Wants us to Interpret

Annex 4 and 5

- Lead by Example
- If not us....WHO?

Recent Changes: Procedures, Forms, and Other Highlights

M.D.A. Standardization Program



Recommended M.D.A. Standardization Program



Recent Changes

**M.D.A. Procedures
for
Field Standardization
Of
Trainers**

M.D.A. Standardization Procedures

- Qualifications
- Prerequisite/Eligibility
- Pre-Standardization exercise
- Five Performance Areas
- Post-Standardization exercise
- Required maintenance Activities

Qualifications

- Most qualified food service sanitarian
- The in-house expert on MI FL2000 & 2005 FC
- Have the desire, skills, and ability to be a mentor, teacher, and leader

Eligibility Criteria

- Meets MPR 16 and 17 requirements
- Attended MDA Food Code/ Food Law 3 Day Course
- 1 year inspection experience or equivalent
- Take and Pass Manager Certification exam

The food service inspection employee's training record indicates they have completed training in the six designated skill areas: (a) Public health principles, b) Communication skills, c) Microbiology, d) Epidemiology, e) Food Law, Food Code, & related policies, and f) HACCP; within 12 months of being assigned to the program. **(MPR 16)**

The food service inspection employee's training record indicates that 25 joint inspections, 25 independent inspections under the review or the trainer, and five evaluation inspections have been completed. **(MPR 17)**

In Addition, Needs One or More of the Following

- Conducts evaluations on a regular basis
- Conducts food safety and/or HACCP training
- Is responsible for standardizing inspection personnel
- Is responsible for evaluating the department's food service program and makes recommendations for improvement²⁹

Pre-Standardization prior to scheduling exercise

- Reading Annex 4 & 5
- Conduct 2 MDA Standardization Evaluations & Submit 2 MDA/ FDA Standardization Evaluation Reports
- Submit 1 Risk Control Plan

Five Performance Areas

- Communication skills
- Understanding and applying HACCP principles
- Correctly applying and interpreting the Michigan Food Law 2000 / 2005 Food Code
- Risk-based inspection technique and evaluation of Good Retail Practices
- Correct use of food service inspection equipment

Post-Standardization Exercise

New Procedures

Within 2 weeks of training, complete and send :

- MDA/ FDA Standardization Evaluation report forms
- Routine evaluation reports. Two of four reports must be hand-written.
- Risk Control Plan from evaluation exercise
- Unless prior approval is given, process terminates in 30 days.

Required Maintenance Requirements

In order to maintain proficiency the Standardized Field Trainer is expected to:

1. MDA Re-standardization exercise every 3yrs.

AND

2. Attend MDA Standardized Trainer workshops,

AND

3. Perform 2 standardized training exercises/inspector yearly,

OR

- Conducts QA field evaluation risk-based inspections routinely,

OR

- Conducts routine food service inspections on a regular bases.

Standardized Field Trainers: Environmental Health Director's Role

By signing the “Standardized Field Trainer Nomination” form or “Standardized Field Trainer Re-Evaluation” form, the Environmental Health Director is ensuring that the candidate has met all eligibility requirements.

Recent Changes

FORMS

**LHD Request for Standardization
Application**

Request for Standardization Renewal

**APPENDIX B
STANDARDIZED FIELD TRAINER NOMINATION FORM**

TO: MDA Food Service Sanitation Section
FROM: (Applicant's Supervisor)
SUBJECT: REQUEST FOR MDA FIELD STANDARDIZATION

APPLICANT INFORMATION

NAME: _____
TITLE: _____
AGENCY: _____
OFFICE TELEPHONE NUMBER: _____
ADDRESS: _____

I have reviewed the eligibility requirements in Chapter 2 of "Procedures for Field Standardization of Local Health Department Trainers" and consider _____ qualified for participation in the MDA Standardization procedure.

(Environmental Health Director Signature)

(Date)

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APPENDIX C
STANDARDIZED FIELD TRAINER RE-EVALUATION FORM

TO: MDA Food Service Program

FROM: _____ (Applicant's Supervisor)

In addition to meeting the required maintenance activities as listed in Chapter 4
Please check one or more of the following that apply for the Standardized Trainer.

<input type="checkbox"/> Conducts inspections on a regular basis <input type="checkbox"/> Conducts food safety and/or HACCP training <input type="checkbox"/> Is responsible for standardizing inspection personnel <input type="checkbox"/> Is responsible for evaluating the department's food service program and makes recommendations for improvement
--

APPLICANT INFORMATION

NAME: _____

TITLE: _____

AGENCY: _____

OFFICE TELEPHONE NUMBER: _____

EMAIL ADDRESS: _____

FAX NUMBER: _____

I have reviewed the eligibility requirements in Chapter 4 of "Procedures for Field Re-Evaluation of Local Health Department Standardized Field Trainers" and consider
_____ qualified for participation in the
MDA Standardization procedure.

(Environmental Health Director Signature)

(Date)

Recent Changes

FORMS

**MDA/FDA
Standardization
Evaluation
Report**

MDA/ FDA Standardization Evaluation Report

Purpose:

1. Stresses open communication
2. Great tool for learning the
2005 Food Code

Communication



Open Communication

- Information that may not be observed.
- Only looking at one phase food flow.

Learning the Food Code

- Contains every section of the Food Code
- With the Report Marking Instructions, an effective tool for code violations

The Report

- The MDA/FDA Standardization Evaluation Report Form is broken into two categories
 - Risk Factors and Food Borne Illness Interventions
 - Good Retail Practices

MDA/FDA Standardization Inspection Report (FDA 7-31-06)			
Establishment Name:		Type of Facility:	
Physical Address:		Person in Charge:	
City:	State:	Zip:	County:
Inspection Time In:	Inspection Time Out:	Date:	Candidate's Name:
Agency:	STANDARD'S Name:		Indicate Person Filling Out Form: (circle one) Candidate's Form / STANDARD's Form

*For each item, indicate one of the following for OBSERVATIONAL STATUS:

IN – Item found in compliance

N.O. – Not observed

OUT – Item found out of compliance

N.A. – Not applicable

The Standard may mark an item "S" to reflect a disagreement in a case where the Candidate has the opportunity to make an observation or take a measurement and fails to do so, and intervention by the Standard would alert the Candidate to the missed opportunity

FOODBORNE ILLNESS INTERVENTIONS AND RISK FACTORS

* Indicates critical items

- | | | |
|--------|----|--|
| STATUS | 1. | Management and Supervision |
| IN OUT | A. | Responsibility – Person in Charge Present. * |
| IN OUT | B. | Demonstration – Code compliance, certified via testing with accredited program, or responses to safety questions regarding operation*. |
| IN OUT | C. | Duties of the Person in Charge. |
| IN OUT | 2. | Employee Health |
| IN OUT | A. | Management awareness and policy regarding handling employee health situations*. |
| IN OUT | B. | Visible or known symptoms or known diagnosis dealt with according to Food Code*. |
| IN OUT | 3. | Consumer Advisory* |
| IN OUT | | Inform consumers about the increased risk associated with especially vulnerable consumers when eating animal foods in raw or undercooked form via disclosure and reminder. |
| NA | | |

Risk Factors

- Questions 1-14
- The following Food Code Sections
(found in the marking instructions)

- Demonstration of Knowledge
- Employee Health
- Consumer Advisory
- Food from Approved Sources
- Time/Temperature Controls
- Food and Food Preparation for Highly Susceptible Populations
- Protection from Contamination
- Food Contact Surfaces
- Proper, Adequate Handwashing
- Good Hygienic Practices
- Prevention of Contamination from Hands
- Handwash Facilities
- Chemicals
- Conformance with Approved/Required Procedures

Good Retail Practices

- Important for basic operational and sanitation.
- Questions 15-23 contain the following code related sections.

Personnel

Food and Food Protection

Food Equipment

Water

Plumbing

Toilet Facilities

Garbage and Refuse Disposal

Physical Facility

Pest and Animal Control

Documentation of Proposed Variance

Using the Form

- There are four answers to most questions.
 - IN
 - OUT
 - N.A.
 - N.O.

Note: There are certain questions that cannot be marked as N.A. or N.O., therefore must be determined as IN or OUT

IN

- Observations are made to support that the establishment is correctly following the Food Code requirements.
 - For most instances, this can only be marked when a temperature or a visual observation is made, i.e. hot holding temperature verifies food is being held greater than 135°F

OUT

- Observations are made to support the determination that the establishment is not following the Food Code requirements.
 - For most instances this can only be marked when a temperature or visual observation is made, i.e. hot holding temperature verifies that food is being held below 135°F.

N.A.

- Not Applicable.
 - The food served or food preparation process does not occur within the operation of the food establishment.
 - Questions have to be asked to determine whether or not the types of foods served and/or food preparation processes are conducted in that establishment even at times when the inspector is not there.

N.O.

- Not Observed
 - The establishment does have the food or food preparation process in question but it is not on-site or occurring during the inspection process.
 - Again, questions have be asked during the interview or inspection process to determine whether or not this should be answered as an NA or NO.

Information can be used

as the sole determination of a violation

in only some policy related instances

such as:

- 1. Employee Health
- 2. Highly Susceptible Populations Part 3-8

When interviewing,
information
is used for
supporting direct observations.

Ten Most Wanted

(Commonly missed lines of questioning)

- Use of wild game or wild mushrooms
- Shellfish documentation
- Raw or undercooked fish and parasite destruction documentation
- Microwave cooking of raw animal foods
- Microwave reheating for hot holding
- Temperatures for slow roasting, hot holding and reheating of pork and beef roast
- Food preparation and cooling from ambient air ingredients
- Time used as a public health control
- Use of sulfites or other food/color additives
- Variances and HACCP procedures

Recent Changes

Report Marking Instructions

With

2005 FDA Food Code References

Report Marking Instructions

- Determines how to mark the MDA/FDA Standardization Evaluation Report.
- Determines where violations are appropriately marked.

ANNEX 2-2

Report Marking Instructions

w/ 2005 Food Code References

For each item, indicate one of the following for **OBSERVATIONAL STATUS**:

IN – Item found in compliance	N.O. – Not observed
OUT – Item found out of compliance	N.A. – Not applicable

Where no option occurs for marking N.O. or N.A., these have been removed from the Marking Instructions.

The *STANDARD* may mark an item “S” to reflect a disagreement in a case where the Candidate has the opportunity to make an observation or take a measurement and fails to do so, and intervention by the *STANDARD* would alert the Candidate to the missed opportunity.

THE RELIANCE OF STATEMENTS MADE BY THE PERSON IN CHARGE IN DETERMINING COMPLIANCE WITH PROVISIONS OF THE FOOD CODE

COMMUNICATION

The *FDA Procedures for STANDARDIZATION of Retail Food Inspection/Training Officers* stresses open communication between the *CANDIDATE* and operator. To be an effective communicator, the *CANDIDATE* is expected to ask questions relative to the flow of food through the establishment, preparation and cooking procedures, as well as employee health and normal everyday operation of the facility. Responses to questions give the *CANDIDATE* a better idea of the controlled and uncontrolled *RISK FACTORS* found in the facility and allows for better budgeting of time resources while conducting the inspection. By assessing *RISK FACTORS* that are suspected of being uncontrolled at times other than the inspection (i.e., before or after the inspection), time can be better spent on troubleshooting problems and bringing the *RISK FACTORS* back under control through proper intervention strategies. The *CANDIDATE* is expected to relay deficiencies in the operation to the *PERSON IN CHARGE* so that on-site and long-term corrective action can be initiated.

THE INTERVIEWING PROCESS

During this questioning, statements made by the *PERSON IN CHARGE (PIC)* or *FOOD EMPLOYEES* can often be used to support or augment direct observations and, in some very limited cases, can be used as the sole basis for determining compliance with provisions of the Food Code.

GUIDELINES FOR USING STATEMENTS MADE BY THE PIC OR FOOD WORKERS TO DETERMINE COMPLIANCE (Further guidance is provided in the Marking Instructions)

IN/OUT

Generally, a mark of OUT must be based on actual observations noted in the facility at the time of the inspection. Regulatory action must be based on evidence gathered during an inspection

Suggestions for Use

- Training for new and existing food evaluators
- After evaluation to locate the proper Food Code Section

Examples from the Report Marking Instructions

2. Employee Health

Food Code References:

- 2-201.11I(2) & (3) Responsibility of the person in charge to require reporting by food employees and applicants
- 2-201.12 Exclusions and restrictions
- 2-201.13 Removal of exclusions and restrictions
- 2-201.14 Responsibility of a food employee or an applicant to report to the person in charge
- 2-201.15 Reporting by the person in charge*

Guidance:

2A. Management awareness and policy

- To mark IN, the person-in-charge must
 - Be aware that employees are required to report certain symptoms or diagnosed illness and
 - Convey knowledge of an employee health policy or have access to one that states actions needed once an employee reports symptoms or diagnosed illness (either verbal or written is acceptable, verbal must be specific to illness and symptom).

2B. Visible or known symptoms/or known diagnosis dealt with according to the Food Code

- To mark IN,
 - item 2A must be IN and
 - during the inspection no employees are ill or experiencing symptoms that require reporting or action by the person-in-charge.

5. Time / Temperature Controls

5.1 Inadequate Cook – Raw Animal Foods

- A. Raw eggs broken on request and prepared for immediate service cooked to 63°C (145°F) for 15 seconds. Raw eggs broken but not prepared for immediate service cooked to 68°C (155°F) for 15 seconds

Food Code Reference:

- 3-401.11(A)(1)(2) Raw animal foods

Guidance:

- Mark IN or OUT when temperatures are taken that verify compliance. If one food item is found inadequately cooked, the item must be marked OUT. If the food is cooked below the required Code temperature and the facility has an approved consumer advisory, mark the item IN. Notes should be taken support IN and OUT status.
- Mark N.A. when raw eggs are not used in the establishment, including those used in recipes
- Mark N.O. when raw eggs are used in the establishment, but you are unable to determine the cooking temperature

19. FACILITIES / EQUIPMENT TO CONTROL PRODUCT TEMPERATURE

Food Code References:

- 3-501.15 Cooling methods
- 4-301.11 Cooling, heating, and holding capacities – equipment

Guidance:

- This item should be marked IN or OUT of compliance, with notes made concerning the reason it is marked OUT. Intent is to determine that adequate hot/cold holding, and heating/cooling equipment and procedures are in place. Do not mark equipment repair items here.

23. FOOD- AND NONFOOD-CONTACT SURFACES: DESIGNED / CONSTRUCTED, MAINTAINED, INSTALLED, LOCATED, OPERATED, CLEANABLE

Food Code References:

3-304.16	Using clean tableware for second portions and refills
3-304.17	Refilling returnables
4-101.11	Characteristics
4-101.12	Cast iron, use limitation
4-101.13	Lead in ceramic, china, and crystal utensils, use limitation
4-101.14	Copper, use limitation
4-101.15	Galvanized metal, use limitation
4-101.17	Lead in pewter alloys, use limitation
4-101.18	Lead in solder and flux, use limitation
4-101.19	Wood, use limitation
4-101.110	Nonstick coatings, use limitation
4-101.111	Nonfood-contact surfaces
4-102.11	Characteristics – single-service / single-use
4-201.11	Equipment and utensils – durability and strength
4-201.12	Food temperature measuring devices – durability and strength
4-202.11	Food-contact surfaces – cleanability

23. FOOD- AND NONFOOD-CONTACT SURFACES: (contd.)

4-202.12	CIP equipment – cleanability
4-202.13	“V” threads, use limitation
4-402.14	Hot oil filtering equipment
4-202.15	Can openers
4-202.16	Nonfood-contact surfaces
4-202.17	Kick plates, removable
4-204.12	Equipment openings, closures and deflectors – functionality
4-204.15	Bearings and gear boxes, leakproof
4-204.16	Beverage tubing, separation
4-204.17	Ice units, separation of drains
4-204.18	Condenser unit, separation
4-204.19	Can openers on vending machines
4-204.110	Molluscan shellfish tanks
4-204.111	Vending machines, automatic shutoff
4-204.121	Vending machines, liquid waste products
4-204.122	Case lot handling equipment, moveability
4-204.123	Vending machine doors and openings
4-205.10	Food equipment, certification and classification – NONDEBITABLE ITEM
4-302.11	Utensils, consumer self-service

23. FOOD- AND NONFOOD-CONTACT SURFACES: (contd.)

4-401.11	Equipment, clothes washers and dryers, and storage cabinets, contamination, prevention
4-402.11	Fixed equipment, spacing or sealing – installation
4-402.12	Fixed equipment, elevation or sealing – installation
4-501.11	Good repair and proper adjustment – equipment
4-501.12	Cutting surfaces4-501.13Microwave ovens
4-502.11	Good repair and calibration – utensils, temperature/pressure devices
4-601.11(B)(C)	Equipment, food-contact surfaces, nonfood-contact surfaces, and utensils
4-602.13	Nonfood-contact surfaces
4-603.11	Dry cleaning – methods
4-603.17	Returnables, cleaning for refilling
4-902.11	Food-contact surfaces – lubricating and reassembling
4-902.12	Equipment – lubricating and reassembling

Guidance:

- This item should be marked IN or OUT of compliance, with notes made concerning the reason it is marked OUT of compliance. Include refrigeration/cooking/holding equipment that does not maintain temperature or other food/nonfood surfaces or equipment that is not maintained/operated.

How Does MDA/FDA use the Standardization Evaluation Report Form?

- 5 joint evaluations are completed for new standardizations
 - One with MDA as lead
 - Four with LHD as lead
- 2 joint evaluations completed for re-standardization

- The MDA evaluates: communication skills, understanding and applying HACCP, applying and interpreting Michigan Food Law 2000/2005 Food Code, risk-based inspection techniques, and correct use of equipment
- Must have a 90% level of agreement in the Foodborne Illness Interventions and Risk Factors section of the MDA/FDA Standardization Evaluation Report with the MDA Standard.
- Must also demonstrate significant knowledge and good judgment.
- A certificate will be issued to successful candidates

Exercise:

**Marking
the
MDA/FDA
Evaluation Report**

Exercise Instructions

Instructions:

Assume you are performing a standardization evaluation and the following 5 observations were made during the evaluation.

For each of the 5 observations, answer the following questions:

Exercise Instructions

For each of the 5 observations, answer the following questions.

- Is there a violation of the Food Code?
- Would you cite a violation?
- Where would you cite the violation on the MDA/FDA Standardization Evaluation Report?
- Is there additional information that is needed and if so what questions are to be asked?

Exercise Instructions

- Please attempt to review the questions beforehand. You will be given a minute or two to review information and then the answers will be discussed as a group.
- Be prepared to discuss with the group.

Observation # 1

At JoeDan's Roadkill Grill, you ask the manager if the establishment has a written employee health policy. He states that there is not. You ask if there is a non-written or oral policy. He says, "If they are sick, I send them home." You ask what "sick" means and the reply is "You know...runny nose, sneezing and stuff..." You find no one in the facility that appears ill and no food employee is working with infections on his/her hands.

Answer #1

- Item 2A – OUT
 - 2-102.11 – Responsibility of the Person in Charge to Require Reporting by Food Employees and Applicants.*

Also Item 2B – OUT

- 2-201.12 Exclusions and Restrictions.* No exclusion or restriction of food workers done.

Observation #2

You observe an uncovered bulk container of dry pasta stored in a locker room.

Answer #2

- Item 7C – OUT
 - 3-302.11 (A)(4) – Packaging and Unpackaged Food – separation, packaging and segregation.* Food must be covered during storage.
- Also in violation (but not necessarily marked)
 - 3-801.11(D)(3) – Food Storage, Prohibited Areas.

Observation #3

The brush used for buttering toast was a wood-handled, natural boar bristle paintbrush.

Answer #3

- Item 23 – OUT
 - 4-101.11(A) – Characteristics.*
Natural boar-bristle paintbrush is not food grade

Observation #4

Sushi rice is being stored at room temperature. The chef explains to you that the rice has been acidified to 3.9. You check the pH and the reading is 3.9. The establishment has not applied for a variance, but is operating under a HACCP plan.

Answer #4

- Item 40 – OUT
 - 3-502.11 – Variance Requirements.*
Establishment is required to apply for a variance if rendering food so that it is not potentially hazardous.

Observation #5

You find documentation that the seafood supplier of the sushi grade fish has frozen the salmon at -31°F for 15 hours, but you find no documentation of how the Yellow fin tuna was frozen at the supplier.

Answer #5

- Item 4F – IN
 - 3-402.11 – Parasite Destruction.*
Salmon must be frozen at -31°F for 15 hours or at -4°F for 168 hours.
The Yellow fin tuna is exempted from the freezing requirements.
 - There is no violation!

Questions and Answers

FUTURE Training Sessions

- Formation of a Standardized Trainers' Workgroup
- Other ideas

Wrap-up and Survey

Michigan Department of Agriculture

Mission statement:

To preserve, promote, and protect
the
food, agricultural, environmental,
and
economic interests
of
the people of Michigan

